

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
WICHITA FALLS DIVISION**

X CORP.,	)	
	)	
<i>Plaintiff,</i>	)	
v.	)	
	)	
WORLD FEDERATION OF	)	
ADVERTISERS; MARS,	)	
INCORPORATED; CVS HEALTH	)	
CORPORATION; ØRSTED A/S; TWITCH	)	
INTERACTIVE, INC.; NESTLÉ S.A.;	)	Civil Action No. 7:24-cv-00114-B
NESTLE USA, INC.;	)	
ABBOTT LABORATORIES;	)	
COLGATE-PALMOLIVE COMPANY;	)	
LEGO A/S; LEGO BRAND RETAIL, INC.;	)	
PINTEREST, INC.; TYSON FOODS, INC.;	)	
SHELL PLC; SHELL USA, INC.; and	)	
SHELL BRANDS INTERNATIONAL AG,	)	
	)	
<i>Defendants.</i>	)	

**JOINT MOTION TO IMPLEMENT JOINT BRIEFING SCHEDULE**

Plaintiff X Corp. (“X” or “Plaintiff”) and Defendants World Federation of Advertisers (“WFA”); Mars, Incorporated (“Mars”); CVS Health Corporation (“CVS”); and Ørsted A/S (“Ørsted”) (collectively, the “Moving Defendants,” and with Plaintiff, the “Parties”) respectfully file this Joint Motion to Implement Joint Briefing Schedule (the “Motion”) and urge that it be granted.

On August 13, 2024, Plaintiff filed this action alleging antitrust claims under Section 1 of the Sherman Act against Defendants. *See* Complaint (Dkt. 1). On November 18, 2024, Plaintiff filed its First Amended Complaint (Dkt. 62), which among other things added as a defendant Twitch Interactive Inc. (“Twitch”). By order of the Court (Dkt. 73), the deadline for Moving Defendants and Twitch to answer or otherwise respond to Plaintiff’s First Amended Complaint

was extended to February 21, 2025, with the Plaintiff to seek leave to file a Second Amended Complaint by January 31, 2025, and with the Parties to submit a joint briefing schedule for a Second Amended Complaint within 21 days of the receipt of leave to file a Second Amended Complaint. The Court granted Plaintiff's unopposed motion for leave to file a Second Amended Complaint on February 6, 2025 (Dkt. 76), and the Second Amended Complaint, adding additional defendants, was filed the same day (Dkt. 77). Summonses for the newly added defendants were issued by the Court's clerk on February 20, 2025 (Dkt. 90), and Plaintiff has informed the Moving Defendants and Twitch that it is in the process of effecting service on the newly added defendants pursuant to Rule 4(h)(1) of the Federal Rules of Civil Procedure, for those newly added defendants located in the United States, and pursuant to Rule 4(h)(2) of the Federal Rules of Civil Procedure using the Hague Convention on the Service Abroad of Judicial and Extrajudicial Documents, for those newly added defendants not located in the United States.

The Parties have conferred and now submit their proposed Joint Briefing Schedule for the Second Amended Complaint. A joint briefing schedule and extended deadlines will facilitate more efficient, streamlined briefing among the defendants, and promote judicial efficiency. (Twitch has advised the Parties that it is in the process of retaining Texas counsel and that it is in agreement with the Parties' proposal, as set forth below.)

1. The deadline for Moving Defendants and Twitch to answer or otherwise respond to Plaintiff's Second Amended Complaint shall be May 14, 2025. Plaintiff's deadline to respond to any responsive motions shall be July 14, 2025. The deadline of the Moving Defendants and Twitch to file reply briefs shall be September 12, 2025.

2. The Parties propose that their Joint Briefing Schedule shall apply to all newly added defendants in the suit who are either: (1) served with the Second Amended Complaint by April 23, 2025; or (2) requested by Plaintiff to waive service by March 15, 2025, and who have agreed to waive service. Nothing herein shall preclude any newly added defendants from seeking leave for deadlines different than those requested through this motion.

This joint briefing schedule will be in the interests of justice and judicial economy and does not prejudice any Party or the newly added defendants. Accordingly, the Parties respectfully urge that the Court grant this Joint Motion and establish the requested deadlines.

February 27, 2025

Respectfully submitted.

/s/ John C. Sullivan

John C. Sullivan

Texas Bar No. 24083920

john.sullivan@the-sl-lawfirm.com

Jace R. Yarbrough

Texas Bar No. 24110560

jace.yarbrough@the-sl-lawfirm.com

S|L LAW PLLC

610 Uptown Boulevard, Suite 2000

Cedar Hill, TX 75104

Phone: (469) 523-1351

Christopher G. Renner (admitted *pro hac vice*)

D.C. Bar No. 1025699

cgrenner@dhillonlaw.com

Jonathan M. Shaw (admitted *pro hac vice*)

Virginia Bar No. 98497

jshaw@dhillonlaw.com

Andrew K. Mann (admitted *pro hac vice*)

Virginia Bar No. 77021

akmann@dhillonlaw.com

DHILLON LAW GROUP, INC.

2121 Eisenhower Avenue, Suite 608

Alexandria, VA 22314

*Attorneys for Plaintiff X Corp.*

/s/ Jason M. Powers

Jason M. Powers  
Texas Bar No. 24007867  
jpowers@velaw.com  
VINSON & ELKINS LLP  
845 Texas Ave., Suite 4700  
Houston, TX 77002  
Phone (713) 758-2222

George M. Kryder  
Texas Bar No. 11742900  
gkryder@velaw.com  
Avery Westerlund  
State Bar No. 24125453  
awesterlund@velaw.com  
VINSON & ELKINS LLP  
2001 Ross Avenue, Suite 3900  
Dallas, TX 75201-2975  
Phone (214) 220-7700

Stephen Medlock (admitted *pro hac vice*)  
D.C. Bar No. 995636  
smedlock@velaw.com  
Adam Hudes (admitted *pro hac vice*)  
D.C. Bar No. 495188  
ahudes@velaw.com  
VINSON & ELKINS LLP  
2200 Pennsylvania Avenue NW  
Suite 500 West  
Washington, DC 20037  
Phone: (202) 639-6578

*Attorneys for Defendant Ørsted A/S*

/s/ Jonathan Bradley Pitt

Jonathan Bradley Pitt (admitted *pro hac vice*)

jpitt@wc.com

Nicholas G. Gamse (admitted *pro hac vice*)

ngamse@wc.com

Kimberly Broecker (admitted *pro hac vice*)

kbroecker@wc.com

WILLIAMS & CONNOLLY LLP

680 Maine Avenue SW

Washington, DC 20024

Phone: (202) 434-5000

Thomas C. Riney

Texas Bar No. 16935100)

tom.riney@uw.com

C. Jason Fenton

Texas Bar No. 24087505)

jason.fenton@uwlaw.com

UNDERWOOD LAW FIRM, P.C.

500 S. Taylor, Suite 1200

Amarillo, TX 79101

Phone: (806) 379-5613

Brad R. Timms

Texas Bar No. 24088535

brad.timms@uwlaw.com

UNDERWOOD LAW FIRM, P.C.

600 Bailey Ave., Suite 200

Fort Worth, TX 76107

Phone: (817) 885-7529

*Attorneys for Defendant CVS Health Corporation*

/s/ Karen Hoffman Lent

Karen Hoffman Lent (admitted *pro hac vice*)

karen.lent@skadden.com

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP

One Manhattan West

New York, NY 10001

Phone: (212) 735-3276

Noelle M. Reed

State Bar No. 24044211

noelle.reed@skadden.com

SKADDEN, ARPS, SLATE, MEAGHER & FLOM, LLP

1000 Louisiana Street, Suite 6800

Houston, TX 77002

Phone: (713) 655-5122

Ralph H. Duggins

State Bar No. 06183700

rduggins@canteyhanger.com

Philip Vickers

State Bar No. 24051699

pvickers@canteyhanger.com

Kate Hancock

State Bar No. 24106048

khancock@canteyhanger.com

CANTEY HANGER LLP

600 West 6th Street, Suite 300

Fort Worth, TX 76102

Phone: (817) 877-2800

*Attorneys for Defendant Mars, Incorporated*

/s/ David C. Miller

David C. Miller

Texas Bar No. 24110114

dmiller@bradley.com

William S. Snyder

Texas Bar No. 00786250

wsnyder@bradley.com

Samuel T. Acker

Texas Bar No. 24100111

sacker@bradley.com

BRADLEY ARANT BOULT CUMMINGS LLP

Fountain Place

1445 Ross Ave., Suite 3600

Dallas, TX 75202

Phone: (214) 597-9800

Fax: (214) 939-8787

Charles E. Elder (admitted *pro hac vice*)

Tennessee Bar No. 038250

celder@bradley.com

BRADLEY ARANT BOULT CUMMINGS LLP

1221 Broadway, Suite 2400

Nashville, TN 37203

Phone: (615) 252-3597

Fax: (615) 252-6380

*Attorneys for Defendant World Federation of  
Advertisers*

**CERTIFICATE OF SERVICE**

I certify that on February 27, 2025, a true and correct copy of the foregoing instrument was served on all counsel of record using the Court's electronic filing system.

/s/ John C. Sullivan  
John C. Sullivan

*Attorney for Plaintiff X Corp.*